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April 18, 2017

VIA CM/ECF

The Honorable Dora L. Irizarry Chief Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Mark Nordlicht, et al., No. 1:16-cr-00640-DLI

Dear Chief Judge Irizarry:

We represent defendant Joseph Mann in the above-referenced case. On behalf of Mr. Mann, we write in advance of the Show Cause hearing scheduled by the Court for May 12, 2017, to join in the motion made by defendant Mark Nordlicht regarding improper leaks of grand jury information in violation of Fed. R. Crim. P. 6(e). *See* Docket Nos. 107 & 112. We join in the motion of Mr. Nordlicht in full, including his requests for prompt and complete pre-hearing discovery from the government of all information in its possession, custody or control concerning these grand jury leaks.

Respectfully submitted,

/s/

Benjamin S. Fischer

cc: All Counsel of Record (Via CM/ECF)